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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

J.H. v. Uber Technologies, Inc., et al., No.
3:25-cv-05342-CRB

R.L. v. Uber Technologies, Inc., et al., No.
3:25-cv-05515-CRB

A.E. v. Uber Technologies, Inc., et al., No.
3:25-cv-07668-CRB

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF CHRISTOPHER V.
COTTON IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO SEAL PERSONAL
IDENTIFYING INFORMATION AND
INFORMATION DESIGNATED AS
CONFIDENTIAL PURSUANT TO ECF 176
CONTAINED IN EXHIBITS TO
DEFENDANTS' REPLY IN SUPPORT OF
DEFENDANTS' MOTION TO COMPEL
COMPLIANCE WITH COURT ORDER**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Christopher V. Cotton, declare as follows:

2 1. I am an attorney at Shook, Hardy & Bacon L.L.P., counsel of record for Defendants
3 Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber” or “Defendants”). I
4 offer this Declaration in the above-captioned matter in support of Uber’s Administrative Motion to
5 Seal Personal Identifying Information and Information Designated as Confidential Pursuant to ECF
6 176 Contained in its Reply in Support of Uber’s Motion to Compel Compliance with Court Order (the
7 “Sealing Motion”).

8 2. The deposition transcripts Uber seeks to seal in this Sealing Motion contain information
9 designated as Confidential under the parties’ Protective Order. *See* ECF 176; *see also* Exs. A and B to
10 Uber’s Reply in Support of its Motion to Compel Compliance with Court Order.

11 3. Under the Protective Order, Uber may not file confidential material such as “personal
12 information about any Party to this lawsuit” “in the public record in this Action” without first filing a
13 motion to seal. ECF 176 ¶¶ 2.3 & 12.5.

14 4. Counsel for Uber previously met and conferred with the Nachawati and Chaffin Luhana
15 firms concerning the sealing of personally identifying information (“PII”) in connection with Uber’s
16 Motion for Entry of (1) an Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
17 Receipts Should Not Be Dismissed with Prejudice and (2) a Case Management Order Addressing
18 Certain Plaintiffs Who Have Not Submitted Receipts. ECF 3602-1. Counsel indicated that they did
19 not oppose sealing PII. The Court granted Uber’s motion to seal. ECF 3616. Some of the sealed
20 information contained in the instant Sealing Motion is similar to the PII that has already been filed
21 under seal and unopposed.

22 5. Counsel for Uber also previously made diligent efforts to meet and confer with
23 Plaintiffs’ counsel concerning the sealing of PII in connection with Uber’s Motion for Entry of an
24 Order to Show Cause Why 6 Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be
25 Dismissed with Prejudice. Those efforts are detailed in my declaration in support of Uber’s motion to
26 seal the PII in that motion. ECF 3783-1. Counsel for Uber have not received any communications
27 from any Plaintiff’s counsel regarding opposition to the sealing of the material detailed in ECF 3783.
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1 Some of the sealed information in this Sealing Motion is similar to the PII that was included in Uber's
2 prior motion to seal.

3 6. On the basis provided above, the Court granted Uber's Administrative Motion to Seal
4 Personal Identifying Information Contained in Defendants' Motion for Entry of Third Receipts Order
5 and Accompanying Documents. ECF 4142. Some of the sealed information contained in this Sealing
6 Motion is similar to the PII that has already been filed under seal.

7 I declare under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct.

9 Dated: December 29, 2025

Respectfully submitted,

11 /s/ Christopher V. Cotton

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